

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HESTAL LIPSCOMB,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-477 SLR
)	
ELECTRONIC DATA SYSTEMS)	
CORPORATION,)	
a Delaware Corporation,)	
)	
Defendant.)	JURY TRIAL DEMANDED

TO: Alyssa M. Schwartz, Esquire
Richards, Layton & Finger, P.A.
920 King Street, P.O. Box 551
Wilmington, DE 19899-0551

NOTICE OF DEPOSITION

Pursuant to Fed. R. Civ. P. 30(b)(6), plaintiff will take the deposition of defendant, Electronic Data Systems Corporation (“EDS”) on February 22, 2006 at 3:00 p.m. at the offices of Smith Katzenstein & Furlow, LLP, 800 Delaware Avenue, 7th Floor, Wilmington, DE 19899. The person designated to testify on behalf of the EDS shall testify as to matters known or reasonably available to EDS with respect to the following issues:

1. The policies, procedures and practices of defendant and its third-party administrator with respect to FMLA leave for defendant’s employees.
2. The working relationship between defendant and its third-party administrator regarding FMLA leave for defendant’s employees.

3. The defendant's decision making process with respect to the plaintiff's request for FMLA leave.
4. The defendant's decision making process with respect to its decision to terminate plaintiff.
5. The defendant's document production in this case.

SMITH, KATZENSTEIN & FURLOW LLP

/s/ Laurence V. Cronin
Laurence V. Cronin (#2385)
800 Delaware Avenue, 7th Floor
P.O. Box 410
Wilmington, DE 19899
(302) 652-8400
Attorneys for Plaintiff

Dated: February 15, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February 2006, I caused a copy of the foregoing NOTICE OF DEPOSITION to be served on the following counsel of record via e-filing:

Alyssa M. Schwartz, Esquire
Richards, Layton & Finger, P.A.
920 King Street, P.O. Box 551
Wilmington, DE 19899-0551

/s/ Laurence V. Cronin
Laurence V. Cronin (ID No. 2385)